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MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/lg/36 DATE: August 31, 2006

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler

RE: Status Report #10 for the Resource Recovery Group/Clayton Chemical Company

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this tenth Monthly Status Report is July 24, 2006, through August 18, 2006.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (the Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 9 was submitted to U.S. EPA on July 31, 2006. A supplemental submission, in the form of an Adobe Acrobat version of the groundwater analytical summary table, was made on August 1, 2006. On August 10, 2006, a correction to the units presented in the notes to the groundwater table was identified and notification was provided to U.S. EPA.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

The primary Removal Action-related activity that was performed for the RRG/Clayton Site during the reporting period was the continued investigation/development of potential treatment and disposal options for the management of the mixed waste (Resources Conservation and Recovery Act [RCRA] and Toxic Substance Control Act [TSCA]) soils that have been generated from excavation activities at the eastern edge of the EZ 4 Work Zone (see the attached Site map for reference).

A weekly summary of activities appears below.

- During the week of July 24, 2006 (July 24 – 28, 2006), BISCo and CRA were on Site to perform stockpile maintenance activities. On July 25, 2006, BISCo and CRA mobilized to the RRG/Clayton Chemical Site to reinstall protective covers on the soil stockpiles located at the Site. Six of the eleven major soil stockpiles at the Site were secured with plastic sheeting before supplies were exhausted. BISCo and CRA subsequently demobilized from the Site with the intent of scheduling a follow up Site visit to complete the activity. The other notable event of July 25, 2006, was that The Respondents received approval from OSC Kevin Turner to use the Veolia Environmental Services, Inc. (Veolia) Port Arthur incinerator facility as disposal facility for Site wastes.

Off site activities for the week concentrated on researching possible remediation technologies that could be applied to manage the mixed waste soils at the Site based on known limitations of various Treatment, Storage, and Disposal Facilities (TSDFs) previously contacted to manage these materials. Towards this end, a conference call was held on July 26, 2006 between The Respondents and U.S. EPA to discuss the management of the Site soils;

- Completed activities during the week of July 31, 2006 consisted of research into possible remedial technologies to be employed in the management of the mixed RCRA/TSCA soils that had been excavated from the eastern portion of the Site. These research efforts were also related to the preparations on the part of The Respondents to a scheduled August 10, 2006, conference call with U.S. EPA to discuss appropriate waste management/treatment options for Site materials;
- Project-related activities completed during the week of August 7, 2006 involved the continued research into disposal and treatment alternatives to address the mixed RCRA/TSCA soils; and
- From August 14 through 18, 2006, activities related to the completion of the Solids Removal Action centered on the scheduling of a field trial to determine the appropriateness of implementing soil milling as a viable/feasible/applicable remedial technology to address VOC concentrations in the mixed RCRA/TSCA soils at the RRG/Clayton Chemical Site. On August 14, 2006, The Respondents and U.S. EPA held a conference call during which it was suggested that a technology evaluation (pilot test) be conducted for the Site by August 25, 2006. Subsequently, arrangements were made to mobilize personnel and equipment to the Site for the completion of a soil milling study. U.S. EPA was notified of the tentative schedule for the field trial on August 17, 2006.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for June 24– 28, 2006; Appendix B – Weekly Summary of Site Activities for July 31 – August 4, 2006; Appendix C – Weekly Summary of Site Activities for August 7– 11, 2006; and Appendix D – Weekly Summary of Site Activities for August 14 – 18, 2006.

1.2 SAMPLING AND ANALYSIS

BISCo secured Environmental Quality Industrial Services (EQIS) to serve as the primary waste sampling, material analysis/laboratory, and waste disposal subcontractor for this Removal Action project. However, due to issues with analytical turn-around time (TAT), the Respondents requested that Severn Trent Laboratories (STL) of St. Louis, Missouri be allowed to replace RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action. This request was approved by OSC Turner on April 20, 2006.

For the reporting period, no samples directly or indirectly related to the Solids Removal Action activities were collected at the RRG/Clayton Site.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. The more significant completed actions were discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through D of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

The excavation of known impacted soils along the eastern edge of the Site has led to the generation of an unexpected waste stream. Analytical results from soil samples collected from the stockpiled materials indicate the chemicals are present in concentrations that exceed the threshold values for RCRA hazardous materials and TSCA materials. There are a limited number of permitted Treatment, Storage, and Disposal Facilities (TSDFs) that will handle these mixed waste streams, and, as such, efforts by the Respondents to arrange for disposal of these materials are continuing.

The Respondents prepared and submitted a proposal to U.S. EPA for the management of this waste based on the findings of BISCO and CRA. On June 9, 2006, the proposal was submitted via e-mail to U.S. EPA for evaluation. Dialog towards the selection of a suitable remedial technology continued between the parties on July 26, 2006 and August 14, 2006.

No problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated previously, no samples were collected during the reporting period, and, subsequently, no analytical results were received.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (August 21, 2006, through September 15, 2006), the following activities are anticipated:

- The Soil Milling Field Trial will be completed and a report documenting the completed activities and subsequent conclusions will be generated. Using these data and other information, if necessary, a mutually agreeable soil management methodology will be selected to address the mixed waste soils at the RRG/Clayton Chemical Site;

- Tank cleaning and demolition activities will be completed. The contents of Tank G8 will be transferred to the appropriate shipping container(s) for final disposal;
- The remaining drummed materials at the Site will be segregated, composited, and processed for off-Site disposal in accordance with the analytical results from the collected waste characterization samples;
- The selected soil management protocols will be initiated at the Site and appropriate tasks will be performed;
- The shipment of materials off-Site for disposal will continue; and
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the remaining removal activities.

4.2 SAMPLING AND ANALYSIS

A variety of material characterization samples are scheduled to be collected during the upcoming reporting period. In support of the soil milling field trial, a combination of pre-treatment and post-treatment stockpile samples should be collected to evaluate the effectiveness of the treatment technology. Additionally, waste characterization samples to confirm/evaluate the nature of the materials at the Site awaiting final disposal will need to be collected. Where applicable, these collected samples will be collected in accordance with the Removal Action Work Plan and the QAPP, and then submitted for chemical analysis. Based on the results from these samples, an appropriate response will be determined and completed accordingly.

Depending on the treatment technology selected, appropriate personnel will perform the sampling activities to determine completion of the selected protocol. The subsequent analysis of the confirmatory and waste characterization samples will be performed by STL St. Louis.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the assembly of hazardous and non-hazardous wastes; soil management activities; waste characterization and disposal activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration (business days)</i>	<i>Expected Start Date</i>
Initiate and complete Soil Milling Field Trial	5 days	August 21, 2006
Install Stormwater Control Measures	As needed/ongoing	September 5, 2006
Continue Tank Sludge Disposal	Ongoing/30 days	September 5, 2006

<i>Activity</i>	<i>Duration (business days)</i>	<i>Expected Start Date</i>
Continue Characterization of Drum Wastes/Drum Processing	Ongoing/30 days	September 5, 2006
Continue Assembly of Site Wastes For Offsite Shipment	Ongoing/30 days	September 5, 2006
Initiate Approved Mixed Waste Management Solution	60 days	September 18, 2006
Submit Status Report # 11	1 day	September 27, 2006

Attachments

FIGURE 1

SITE MAP

APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 24 - 28, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/38 DATE: August 28, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler

RE: Weekly Summary of Site Activities for July 24 - 28, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the thirty-fourth week (the period July 24 through 28, 2006) is presented below.

Date	Tasks	Activity
July 24, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents informed START Tom Binz via voicemail of on site activities scheduled for July 25, 2006. The Respondents continued to prepare the applicable notification forms for the Texas Commission of Environmental Quality (TCEQ) in anticipation of approval of the Veolia Port Arthur, TX facility as an approved waste disposal site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. Conestoga-Rovers & Associates (CRA) continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal

Date	Tasks	Activity
July 24, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Service Company (BISCO) and CRA continued to research disposal options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	No activity
July 25, 2006	Mobilization Activities	CRA and BISCO personnel mobilized to and demobilized from the Site
	Project Coordination	No on site START presence. The Respondents were informed by OSC Kevin Turner that the Veolia Port Arthur, TX facility was an approved waste disposal site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	CRA and BISCO installed plastic sheeting over 6 (stockpiles 3, 5, 5B, 6, 7 and TP-50/GC) of the 11 major soil stockpiles at the Site (stockpiles 2, 4/4B, 5C, GP-5/GP-6, and TP-24/25 were not covered due to no sheeting). CRA and BISCO continued to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	The Respondents were told that the 6 Gaylord boxes with the waste characterization samples would not be sent back to the Site, but instead would be trans-shipped within the Veolia network of facilities to the Port Arthur, TX incinerator for final disposal

Date	Tasks	Activity
July 26, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. U.S. EPA and The Respondents had a conference call to discuss the July 20, 2006 response to OSC Turner's soil management conditions letter. OSC Turner requested additional information on proposed VOC treatment technology, and a follow up conference call was scheduled for August 10 th . The Respondents continued to prepare the applicable TCEQ notification forms to ship the Gaylord boxes to the Veolia Port Arthur, TX facility
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continued to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
July 27, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents began preparations for the August 10 th conference call with U.S. EPA to determine an appropriate means of addressing the mixed waste soils at the Site. The Respondents continued to prepare the applicable TCEQ notification forms to ship the Gaylord boxes to the Veolia Port Arthur, TX facility
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06

Date	Tasks	Activity
July 27, 2006	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continued to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity
July 28, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the August 10 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site. The Respondents continued to prepare the applicable TCEQ notification forms to ship the Gaylord boxes to the Veolia Port Arthur, TX facility
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continued to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 31 – AUGUST 4, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/39 DATE: August 28, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler

RE: Weekly Summary of Site Activities for July 31 – August 4, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the thirty-fifth week (the period July 31 through August 4, 2006) is presented below.

Date	Tasks	Activity
July 31, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents submitted Monthly Status Report # 9 to U.S. EPA via electronic mail (e-mail). The Respondents continued to prepare for the August 10 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. Conestoga-Rovers & Associates (CRA) continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site

Date	Tasks	Activity
July 31, 2006	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Service Company (BISCO) and CRA continued to research disposal options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	No activity
August 1, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the August 10 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site. The Respondents re-submitted the summary table of the groundwater sample analytical results from Status Report # 9 to U.S. EPA to avoid a possible printing issue. This data was submitted via e-mail
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	CRA and BISCO continued to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
August 2, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the August 10 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity

Date	Tasks	Activity
August 2, 2006	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCO continued to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
August 3, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the August 10 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continued to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity
August 4, 2006	Mobilization Activities	No activity

Date	Tasks	Activity
August 4, 2006	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the August 10 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continued to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment

APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR AUGUST 7 – 11, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/40 DATE: August 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler

RE: Weekly Summary of Site Activities for August 7 - 11, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the thirty-sixth week (the period August 7 through August 11, 2006) is presented below.

Date	Tasks	Activity
August 7, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. Conestoga-Rovers & Associates (CRA) continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
August 7, 2006	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Service Company (BISCO) and CRA continued to research disposal options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	No activity
August 8, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	CRA and BISCO continued to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
August 9, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site. OSC Turner provided The Respondents with information on a new Volatile Organic Compound (VOC) remediation technology for evaluation/consideration in addressing the mixed waste (RCRA/TSCA) soils
	Site Preparation	No activity

Date	Tasks	Activity
August 9, 2006	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continued to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
August 10, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents notified U.S. EPA of an error in the reported units of the analytical results submitted with Monthly Status Report # 9 and submitted the corrected table/information
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCo and CRA continued to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity
August 11, 2006	Mobilization Activities	No activity

Date	Tasks	Activity
August 11, 2006	Project Coordination	No on site START presence due to lack of Site activities. The Respondents continued to prepare for the August 14 th conference call with U.S. EPA to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/ Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/ Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continued to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment

APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR AUGUST 14 - 18, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/37 DATE: August 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler

RE: Weekly Summary of Site Activities for August 14 - 18, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the thirty-seventh week (the period August 14 through August 18, 2006) is presented below.

Date	Tasks	Activity
August 14, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents and U.S. EPA had another conference call to discuss appropriate management of the mixed waste (RCRA/TSCA) soils at the Site. Information on the Mobile Steam Distillation (MSD) unit was forwarded to U.S. EPA in accordance with the request made by U.S. EPA during the July 26, 2006, conference call. An August 25 th deadline for the completion of a soil milling field trial was discussed
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. Conestoga-Rovers & Associates (CRA) continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal

Date	Tasks	Activity
August 14, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Service Company (BISCo) and CRA began making preparations for completing the soil milling field trial during the week of August 21, 2006 as a means of managing the mixed waste soils at the Site
	Miscellaneous	No activity
August 15, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continued to prepare for completing the soil milling field trial at the Site during the week of August 21 st to determine if the technology is appropriate for managing the mixed waste soils at the Site
	Miscellaneous	No activity
August 16, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. START Tom Binz was contacted regarding the planned soil milling field trial for the week of August 21 st
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06

Date	Tasks	Activity
August 16, 2006	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continued to prepare for completing the soil milling field trial at the Site during the week of August 21 st to determine if the technology is appropriate for managing the mixed waste soils at the Site
	Miscellaneous	No activity
August 17, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents provided U.S. EPA with a tentative activity schedule for the soil milling field trial
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continued to prepare for completing the soil milling field trail at the Site during the week of August 21 st to determine if the technology is appropriate for managing the mixed waste soils at the Site
	Miscellaneous	No activity
August 18, 2006	Mobilization Activities	No activity

Date	Tasks	Activity
August 18, 2006	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continued discussions with Veolia regarding the loading logistics for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCO continued to prepare for completing the soil milling field trial at the Site during the week of August 21 st to determine if the technology is appropriate for managing the mixed waste soils at the Site
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment